## REMARKS

Claims 1-6 and 8-28 are pending in the instant application and stand rejected. Claim 8 is objected to as depending from a rejected base claim. The assignee is grateful to the examiner for indicating that claim 8 would be allowable if rewritten in independent form. The assignee traverses the rejections of claims 1-6 and 9-28.

### *Claim Rejections – 35 U.S.C. § 103*

Claims 1-6 and 9-28 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,937,422, issued to Nelson, et al. (Nelson) in view of U.S. Patent No. 6,272,456, issued to de Campos (de Campos). The assignee respectfully disagrees that the cited references render obvious the subject matter of the pending claims.

Claim 1 recites a method of building a custom word list for use in text operations on an electronic device. The method includes the step of determining a source of each text item in a collection of text items. Further, claim 1 recites that the step of assigning a weighting to words identified in scanning a collection of text items comprises the step of calculating the weighting for each identified word based on the source of the text item in which the word was found. In rejecting claim 1, the office action cites de Campos as disclosing these limitations, stating that de Campos "determine[s] highest scoring between the first language and the second language," and citing as support from de Campos the Abstract, the passages at column 15, line 20 – column 16, line 8 and column 16, line 55 – column 17, line 10, and element 1025 of Figure 10. Furthermore in the "Response to Arguments" section of the office action, the language profiles taught by de Campos are equated with the sources recited in claim 1. The office action states, "De Campos teaches identifying letters or words inputs from different language profiles (or sources)..."

As noted above, the office action equates a language profile of de Campos with the term "source" recited in claim 1. However, the two are fundamentally different. A source in claim 1 determines what words are to be processed. In contrast, a language profile in de Campos does not determine what input is to be processed since that is determined *a priori* by another different entity. Accordingly, the language profile does not determine what items are to be processed, but rather only reacts to the set of items that have already been determined to be processed.

More specifically, de Campos defines static language profiles that indicate statistical information about the overall occurrence of particular letter combinations (n-grams) in a given language. Text analyzed according to the teachings of de Campos is then compared against those language profiles, but the analyzed text does not in any sense <u>originate</u> from the language profiles, as opposed to the text items recited in claim 1, each of which originates from a source. Thus, the selection of n-grams from the language profiles in de Campos occurs only in response to user input and not from a language profile.

Moreover, de Campos is not directed at all to word list construction (which is the subject matter of claim 1), but rather analyzes only linguistic fragments of a word (i.e., n-grams) and for the overall goal of general identification of which language might be present with respect to a given text. The macroscopic level of language prediction involves a fundamentally different algorithm than construction of a word-based list for text operations, and cannot be used to solve the problem addressed by claim 1. To further illustrate the significantly different contexts between de Campos and claim 1, the use of different sources in claim 1 would result in the building of different word lists, as scanning would likely identify different words and the words identified will be weighted differently. In de Campos, on the other hand, the language profiles, which the office action has equated to the sources recited in claim 1, do not change and thus

could not be the agent of change for the text operations. The static nature of the language profiles is demonstrated, for example, when de Campos states, "Once the set of tri-gram language profiles 215 for the different languages has been created, the language of an unknown document can be identified." (de Campos, column 11, lines 7-9.) Due to the significant contextual differences between the teachings of de Campos and the subject matter recited in claim 1, de Campos does not teach the subject matter of claim 1. Therefore, claim 1 is allowable and should proceed to issuance.

Independent claim 24 recites subject matter analogous to that of claim 1. In addition, the office action rejected claim 24 under the same combination of references cited in rejecting claim 1. Therefore, claim 24 is allowable for at least the reasons set forth above with respect to claim 1, and claim 24 should proceed to issuance.

It is noted that the assignee has not presented any arguments with respect to pending dependent claims, 2-6, 9-23, and 25-28. This is done without prejudice to the assignee's right to present arguments regarding each of the dependent claims at any point in the future. Further, since all of the dependent claims depend from independent claims that are patentable over the cited references, the dependent claims are themselves patentable for at least the reasons set forth above with respect to the independent claims.
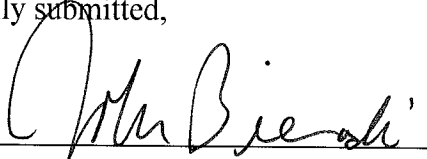
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## CONCLUSION

For the foregoing reasons, the assignee respectfully submits that the pending claims are allowable. Therefore, the assignee respectfully requests that the examiner pass this case to issuance.

Respectfully submitted,

By: _____

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